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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AMERICAN STEAMSHIP OWNERS MUTUAL
PROTECTION AND INDEMNITY ASSOCIATION, INC.,

Plaintiff,

04 Civ. 04309 (LAK)
(JCF)

-against-

(ECF CASE)

ALCOA STEAMSHIP CO., INC., et al.,

Defendants.

DEFENDANT FARRELL LINES, INC'S RESPONSE TO PLAINTIFF'S OBJECTIONS
TO MAGISTRATE JUDGE FRANCIS' ORDERS OF SEPTEMBER 13 AND 15, 2005

Defendant Farrell Lines, Inc. adopts and incorporates by reference the arguments and authorities in opposition to Plaintiff's Objections To Magistrate Judge Francis' Orders Of September 13 And 15, 2005 set forth in the memoranda of law submitted by defendants Keystone Shipping Co. et al. For all of the reasons set forth therein, plaintiff's objections should be denied.

Dated: New York, New York
October 17, 2005

BROWN RUDNICK BERLACK ISRAELS LLP

By: /s/ Andrew Dash

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